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BEN ELLISON, WSBA #48315 Email: salishsealegal@outlook.com SALISH SEA LEGAL PLLC 2212 Queen Anne Avenue North, No. 719 Seattle, WA 98109 Telephone: (206) 257-9547 Attorney for the Unsecured Creditors Committee

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WASHINGTON

In re: 18-03197-FPC11

GIGA WATT, INC.

NOTICE OF MOTION TO EMPLOY SPECIAL COUNSEL FOR UNSECURED CREDITORS

UNSECURED CREDITORS COMMITTEE UNDER 11 U.S.C. §

1103 NUNC PRO TUNC

Please take notice that the Unsecured Creditors Committee ("Committee") in the above-captioned bankruptcy case, has filed an application to employ Beveridge & Diamond P.C., and its attorney, Eric Christensen, as special litigation counsel to investigate the nature of rights the bankruptcy estate may possess in the Douglas County PUD electricity contract for the Pangborn facility ("Employment Application"). The Committee provided notice of the Employment Application to the United States Trustee on December 10, 2019.

Please take further notice that any objection to the Employment Application must be filed with the above-captioned court and served upon undersigned counsel within seven (7) days of the service date set forth below.

NOTICE OF APPLICATION TO EMPLOY SPECIAL COUNSEL - 1

Please take further note that the Court may enter an order without an actual hearing or further notice unless a written objection is timely served and filed. DATED: December 16, 2019 By: s/Benjamin Ellison Benjamin Ellison, WSBA No. 48315 Salish Sea Legal PLLC 2212 Queen Anne Ave North, No. 719 Seattle, WA 98109 Tel: (206) 257-9547 salishsealegal@outlook.com Proposed Counsel for the Committee of Unsecured Creditors

NOTICE OF APPLICATION TO EMPLOY SPECIAL COUNSEL - 2